

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2003-326-C

IN RE:)
Analysis of Continued Availability of)
Unbundled Local Switching for Mass Market)
Customers Pursuant to the Federal Communication)
Commission's Triennial Review Order)
)

REBUTTAL TESTIMONY OF SHERRY LICHTENBERG

On Behalf Of

MCI WORLDCOM COMMUNICATIONS, INC.
AND

MCIMETRO ACCESS TRANSMISSION SERVICES LLC

March 12, 2004

1 **Q. PLEASE STATE YOUR NAME, EMPLOYER AND TITLE.**

2 A. My name is Sherry Lichtenberg. I am currently employed by MCI as Senior
3 Manager, Operational Support Systems Interfaces and Facilities Development.

4 **Q. ARE YOU THE SAME SHERRY LICHTENBERG WHO PROVIDED**
5 **DIRECT TESTIMONY IN THIS DOCKET?**

6 A. Yes.

7 **Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY IN THIS**
8 **PROCEEDING?**

9 A. The purpose of my rebuttal testimony is to rebut the Direct Testimony of
10 BellSouth witnesses Kenneth L. Ainsworth, Ronald M. Pate, Alfred A. Heartley,
11 and Alphonso J. Varner.

12

13 **Scalability of BellSouth's Systems**

14 **Q. WHY IS SCALABILITY AN ISSUE?**

15 A. BellSouth's testimony makes clear that its UNE-L provisioning processes are
16 intensively manual. As explained below, moving from UNE-P to UNE-L would
17 involve an exponential increase in UNE-L provisioning volumes. Manual
18 processing of such volumes would give rise to concern even if they were to take
19 place for a single project over a relatively short period, but in fact the manual
20 handling would have to take place day in and day out, month in and month out in
21 every affected South Carolina wire center.

1 **Q. WHAT IS THE RISK OF REQUIRING CLECS TO USE A**
2 **PROVISIONING PROCESS THAT MAY FAIL TO WORK PROPERLY**
3 **AT HIGH VOLUMES?**

4 A. The immediate risk is there would be a large increase in human errors that would
5 cause provisioning delays, customer outages and other service problems. Over
6 the longer term, negative customer experience would harm CLECs and ultimately
7 undermine local competition.

8 **Q. SEVERAL BELL SOUTH WITNESSES EMPHASIZE ITS 271**
9 **APPROVALS IN 2002 IN SUPPORT OF ITS UNE-L PROVISIONING**
10 **PROCESSES. IS THIS A VALID POINT?**

11 A No. In its Triennial Review Order, the FCC rejected the argument that the 271
12 approvals demonstrated that CLECs were not impaired without access to
13 unbundled local switching. The FCC emphasized that UNE-L volumes would
14 increase to levels much higher than were evaluated during the 271 process:

15 While incumbent LECs reference the Commission's determination
16 in multiple section 271 orders that BOCs provision hot cuts at a
17 level of quality that offers efficient competitors a meaningful
18 opportunity to compete, and argue that performance data show that
19 current hot cut performance is satisfactory, even as the number of
20 hot cuts has increased, we find that the number of hot cuts
21 performed by BOCs in connection with the section 271 process is
22 not comparable to the number that incumbent LECs would need to
23 perform if unbundled switching were not available for all customer
24 locations served with voice-grade loops. In the states where
25 section 271 authorization has been granted, unbundled local circuit
26 switching has been available and, accordingly, the BOCs' hot cut
27 performance has generally been limited. Moreover, *we find that*
28 *the issue is not how well the process works currently with limited*
29 *hot cut volumes, rather the issue identified by the record is an*
30 *inherent limitation in the number of manual cut overs that can*
31 *be performed, which poses a barrier to entry that is likely to make*
32 *entry into a market uneconomic. . . . For those reasons, the*

1 *Commission’s prior findings in section 271 orders do not support*
2 *a finding here that competitive carriers would not be impaired if*
3 *they were required to rely on the hot cut process to serve all mass*
4 *market customers.*

5
6 (Triennial Review Order, ¶ 469 (footnotes omitted, emphasis added).)

7 **Q. DOES BELL SOUTH PRESENT EVIDENCE DEMONSTRATING THAT**
8 **ITS SYSTEMS CAN HANDLE MASS MARKET VOLUMES OF UNE-L**
9 **ORDERS?**

10 A. No. BellSouth for the most part simply promises that it can scale its systems to
11 handle higher volumes if called upon to do so. Such promises were unacceptable
12 to the FCC and should be to this Commission as well. As the FCC stated: “We
13 find . . . incumbent LECs’ promises of future hot cut performance insufficient to
14 support [an FCC] finding that the hot cut process does not impair the ability of a
15 requesting carrier to provide the service it seeks to offer without at least some sort
16 of unbundled circuit switching.” (Triennial Review Order, ¶ 469 n.1437.)

17 **Q. DOES MR. VARNER’S TESTIMONY CONCERNING BELL SOUTH’S**
18 **PERFORMANCE METRICS SUPPORT BELL SOUTH’S CLAIM THAT**
19 **ITS SYSTEMS ARE SCALABLE?**

20 A. No. At best, Mr. Varner’s testimony addresses BellSouth’s performance with
21 respect to the current low level of UNE-L orders. To make matters worse, his
22 testimony does not give a clear picture of BellSouth’s actual performance on
23 UNE-L orders. For example, at pages 18-19 of his testimony, he states that
24 85.93% of the “UNE Other” (non-UNE-P) LSRs met the flow through standard
25 over a certain period. In fact, however, most UNE-L LSRs do not flow through
26 BellSouth’s systems, when LSRs that fall out for manual processing by design are

1 taken into account. Indeed, BellSouth recently acknowledged that for purposes of
2 its force model, it assumed that only 37% of UNE-L LSRs would flow through its
3 systems. In contrast, the percentage of fully mechanized UNE-P migration orders
4 in South Carolina from July 2002 to August 2003 ranged from 50.0% to 92.6%,
5 and the percentage was 85.0% or above in all but two months. (BellSouth
6 response to AT&T First Interrogatory No. 32.)
7

8 **Q. WHAT IS THE SIGNIFICANCE OF THE LOW FLOW THROUGH OF**
9 **UNE-L ORDERS?**

10 A. Low flow through means that a significant number of UNE-L orders will fall out
11 of the systems and must be processed manually by BellSouth's Local Carrier
12 Service Center. Thus, not only are BellSouth's physical UNE-L hot cut processes
13 (including the processes used to notify CLECs of the status of a cut) intensively
14 manual, but its ordering processes are largely manual as well. Manual ordering
15 processes compound the problems introduced by the manual provisioning
16 processes, increasing still more the chances for human error and customer service
17 outages and other problems.

18 **Q. HOW DO CURRENT UNE-L INSTALLATION INTERVALS COMPARE**
19 **TO UNE-P INTERVALS?**

20 A. Regional installation intervals for 2 wire analog loops with LNP were 5.06 days
21 for non-design loops and 5.32 days for design loops in October 2003. During that
22 same period, comparable UNE-P installation intervals were 0.36 days for non-
23 dispatch orders and 1.52 days where dispatch was required. (See October 2003

1 report entitled “FOCI UNE and Non-Design Fully Mech Non-Dispatch SQM
2 (Region).”) Thus, even at current volumes UNE-L migrations take substantially
3 longer than UNE-P migrations.

4 **Q. BELLSOUTH WITNESSES AINSWORTH AND PATE POINT TO THIRD**
5 **PARTY TESTING AS EVIDENCE THAT BELLSOUTH’S SYSTEMS**
6 **SUPPORTING UNE-L ARE ADEQUATE. DO YOU AGREE?**

7 A. No. Mr. Ainsworth refers to process and transaction testing of hot cuts (PPR-9
8 and TVV-4) at page 16 of his Direct Testimony, but both of the tests he refers to
9 involved low volumes of orders, either issued by BearingPoint or a CLEC. In
10 addition, the tests did not evaluate the ancillary processes necessary in a UNE-L
11 environment, such as LNP, E911, and CLEC-to-CLEC migrations. At page 13 of
12 his Direct Testimony, Mr. Pate refers to another test (TVV-2) done for normal,
13 peak and stress volumes, but fails to note that the orders tested did not go through
14 the physical provisioning process, meaning there were no actual hot cuts
15 performed. Moreover, TVV-2 involved mostly orders that flowed through
16 BellSouth’s order processing systems without human intervention, and thus
17 involved an order mix quite different from one with just UNE-L orders. The
18 bottom line is that BearingPoint never did volume testing of BellSouth’s physical
19 hot cut process, nor for that matter was there any volume testing that focused
20 exclusively on UNE-L orders. Third party testing provides no evidence of how
21 BellSouth’s systems could be expected to perform with mass market volumes.

22 **Q. BELLSOUTH WITNESSES AINSWORTH AND HEARTLEY DISCUSS A**
23 **FORCE MODEL THEY SAY PREDICTS THE NUMBER OF**

1 **PERSONNEL THAT WOULD NEED TO BE ADDED TO HANDLE**
2 **ADDITIONAL VOLUMES OF HOT CUTS. DOES THIS MODEL**
3 **ESTABLISH WHETHER BELL SOUTH CAN SEAMLESSLY PROCESS**
4 **HIGH VOLUMES OF UNE-L ORDERS?**

5 A. No. To the contrary, this testimony demonstrates how intensively manual
6 BellSouth's processes are because BellSouth's only proposed way to address
7 much higher volumes of hot cuts is to hire more people. The problem that
8 BellSouth fails to acknowledge is that mass market volumes are of a different
9 order of magnitude than BellSouth's manual processes currently encounter. From
10 July 2002 to August 2003, CLECs submitted between 43 to 111 total UNE-L
11 migration orders per month in South Carolina, whereas they submitted between
12 3,175 to 12,766 total UNE-P migration orders per month during the same period.
13 (BellSouth responses to AT&T First Interrogatory Nos. 28 and 32.) Using a
14 mathematical model to calculate the number of additional people that would be
15 necessary in theory to handle such increased volumes fails to address the
16 fundamental question of whether simply staffing up can address the problem. In
17 the end, BellSouth just says "trust me." The Commission should not accept that
18 paper promise since every hot cut that fails will directly impact a South Carolina
19 consumer.

20
21 **Ability of BellSouth's Systems to Process All Types of UNE-L Orders**

22 **Q. DOES BELL SOUTH ADDRESS ALL THE ORDERING SCENARIOS**
23 **YOU ADDRESSED IN YOUR DIRECT TESTIMONY?**

1 A. No. BellSouth focuses on migrations from BellSouth to CLECs and ignores other
2 kinds of transactions, such as CLEC-to-CLEC migrations.

3 **Q. PLEASE DESCRIBE WHAT IS INVOLVED IN MIGRATING A**
4 **CUSTOMER FROM ONE CLEC TO ANOTHER.**

5 A. Of course, the loop needs to be moved from the losing CLEC's circuit appearance
6 (CFA) to the winning CLEC's CFA, but that process will not provide the
7 customer with the service that he has ordered. A CLEC-to-CLEC migration
8 requires the losing CLEC to make the loop available to the winning CLEC for re-
9 use, which requires providing the correct circuit ID (the physical identifier for the
10 circuit being used to provide the customer's service) and channel and pair
11 assignment information to the winning CLEC. In addition, the losing CLEC must
12 initiate the 10-digit LNP trigger in its switch and unlock the E911 database.
13 While BellSouth is not directly involved in this process, the customer will not
14 have the service he has requested until that process is complete. This
15 Commission should not force CLECs to move to UNE-L until the CLEC-to-
16 CLEC migration process is in place and tested, since the only "winner" in the
17 chaos that will ensue if customers are "stranded" on one CLEC's platform will be
18 BellSouth.

19 **Q. WHAT SHOULD BE DONE TO DEAL WITH THE REALITY THAT**
20 **IMPAIRMENT ARISES NOT JUST FROM BELL SOUTH'S SYSTEMS,**
21 **BUT FROM OTHER INDUSTRY PLAYERS AS WELL?**

22 A. As I discussed in my Direct Testimony, operational issues should be addressed in
23 commission-sponsored industry workshops.

1

2

3

Batch Hot Cut Process

4

**Q. HAS BELLSOUTH DEVELOPED AN ADEQUATE BATCH HOT CUT
PROCESS?**

5

6

A. No. BellSouth has developed a manually intensive batch ordering process that does not provide a seamless method for transitioning existing UNE-P customers to UNE-L. BellSouth's batch ordering process requires additional steps (a manual spreadsheet, negotiation for due dates and a new batch LSR) to the process. In addition, the process allows BellSouth to set due dates individually for each of the orders in the batch. These additional steps seem to be contrary to the FCC's recommendation that a batch process could simplify, streamline, and shorten the UNE-P to UNE-L migration process.

7

8

9

10

11

12

13

14

**Q. HAS BELLSOUTH STATED THAT IT WILL MAKE IMPROVEMENTS
TO ITS PROCESS?**

15

16

A. Yes, BellSouth recently stated in its Florida surrebuttal testimony that it intends to make certain improvements. I will address BellSouth's proposal after discussing the problems with the existing process.

17

18

19

**Q. ARE THERE REASONS TO BE CONCERNED ABOUT THE EXISTING
BATCH ORDERING PROCESS?**

20

21

A. Yes. The existing batch ordering process starts with the requirement that the CLEC provide its Account Manager with a manual spreadsheet listing the lines to be moved. The Account Manager has 4 business days to review the spreadsheet

22

23

1 and assign due dates to each of the 99 separate accounts that can be listed. (For a
2 carrier providing residential service, the 99 accounts will translate to 99 individual
3 customers.) The Account Manager then will return the spreadsheet to the CLEC.
4 Unlike all other ILECs, BellSouth does not necessarily assign the same due date
5 to each of the lines on the spreadsheet. BellSouth's apparently random date
6 selection will not allow CLECs to plan for the transition of their customers and
7 will create more work for all involved. Once the CLEC receives the spreadsheet
8 with the listing of lines and proposed completion dates, the CLEC must create the
9 batch ordering LSR – only then can the orders be submitted electronically to
10 BellSouth's OSS. BellSouth's internal systems will "explode" a single batch LSR
11 into multiple LSRs. This process did not exist and therefore was not tested during
12 the 271 proceedings and BellSouth has not provided detailed documentation on
13 how the process works, only the brief documentation available on the BellSouth
14 CLEC web site. I am concerned that once CLECs begin to use this process, it will
15 result in more orders falling to manual handling and more errors. At the very
16 least, the batch ordering process adds steps to a process that should simplify the
17 UNE-L ordering process. And because BellSouth's systems must issue multiple
18 internal orders for each LSR, problems such as the premature disconnects, which
19 were a problem with UNE-P until BellSouth removed its two order process,
20 would likely recur.

21 **Q. HOW WOULD BELL SOUTH'S BATCH ORDERING PROCESS AFFECT**
22 **CLECS?**

1 A. CLECs would need to develop new software to develop and send the batch LSR.
2 Additional software may also be necessary to accept the notifiers issued for the
3 individual LSRs created by the BellSouth internal systems, since the current
4 ordering processes for both UNE-P and UNE-L include a one-to-one correlation
5 between orders issued and FOCs and other notifiers received. Thus, if a CLEC
6 submitted a batch LSR via EDI, it would expect to receive an FOC for this
7 submission, rather than FOCs for each of the orders included in the batch LSR.
8 MCI believes that the process can be enhanced very easily by removing the
9 requirement for a spreadsheet, a negotiation process, or the single “batch LSR.”
10 MCI would prefer a process that provides standard due dates and allows the
11 issuance of individual LSRs, but BellSouth continues to refuse to collaborate with
12 CLECs to develop a true batch hot cut process. BellSouth is the only RBOC that
13 has not established collaboratives to develop a batch hot cut process, preferring
14 instead to simply tell CLECs and this Commission that the existing process is
15 “good enough.”

16 **Q. IS BELL SOUTH’S BATCH ORDERING PROCESS EFFICIENT?**

17 A. No. The four business days BellSouth requires for initial negotiation is far too
18 long; the entire process from start to finish should take five business days.
19 CLECs should not be forced to perform additional steps. Due dates should be
20 decided in advance using a scheduling tool such as the one that that SBC and
21 Qwest are proposing. Communications between the ILEC and the CLEC should
22 be electronic, using a system similar to the Verizon WPTS hot cut tool, the Status

1 Tool recently proposed by Qwest, or the SBC-proposed PWS system. Adding
2 these tools would greatly improve BellSouth's process.

3 **Q. HOW DOES THE BATCH ORDERING PROCESS ADDRESS LINE**
4 **SPLIT LINES?**

5 A. My understanding is that when a customer is served by a UNE-P voice CLEC and
6 a data CLEC over a line splitting configuration where BellSouth provides the
7 splitter and the customer is being migrated to a UNE-L loop, BellSouth will
8 disconnect the CLEC line from the splitter and thus take down the customer's
9 data service. The line would then be migrated to UNE-L. Theoretically, the
10 CLEC could then order that the line splitting be re-installed using its own splitter,
11 but BellSouth has yet to provide information on how this process will be
12 accomplished, particularly if the CLEC is teaming with a data CLEC to provide
13 line splitting via a second collocation arrangement (one for data). In addition,
14 BellSouth has provided no information on how a line splitting customer served by
15 a CLEC provided splitter can be migrated to a UNE-L with a line splitting
16 arrangement. A process that does not allow the customer to retain his or her data
17 provider when he moves to UNE-L is not acceptable and harms customers
18 directly. This process must change so the customer's line splitting arrangement is
19 not taken down.

20 **Q. WHAT PROCESS IMPROVEMENTS HAS BELL SOUTH STATED IT**
21 **WILL MAKE?**

22 A. BellSouth has stated that it will include CLEC-to-CLEC migrations in its batch
23 process; guarantee that all the lines of an end user's account will be cut on the

1 same day; include after-hours and Saturday cuts; guarantee a four-hour window
2 for coordinated hot cuts; include a timely restoral process if there is a problem
3 with the cut; implement a web-based communication system for non-coordinated
4 cuts; reduce the provisioning interval to 8 days; implement a scheduling tool; and
5 include DS0 EELs in the batch process.

6 **Q. WILL THESE PROBLEMS ADDRESS ALL OF MCI'S CONCERNS?**

7 **A.** No. Although BellSouth's proposal appears to be a step in the right direction,
8 there are a number of problems with it. As an initial matter, BellSouth has
9 provided little detail with its proposal and it appears that much of the proposal
10 would be implemented after the Commission's ruling in this proceeding, so
11 neither the Commission nor the parties will be able to evaluate the effectiveness
12 of the new process for purposes of this case. BellSouth does not state whether the
13 due date negotiation process will continue to be required, whether CLECs will
14 continue to be required to submit a spreadsheet listing its proposed migration
15 orders as a prerequisite to negotiations with the project manager, and what
16 systems will be used to update the "automated status tool." The limited level of
17 detail BellSouth has provided does not allow this Commission or CLECs to
18 determine whether it meets their needs.

19 **Q. HAVE CLECS SUBMITTED CHANGES TO THE BELL SOUTH BATCH**
20 **HOT CUT PROCESS THROUGH THE CHANGE MANAGEMENT**
21 **PROCESS?**

1 A. Yes. CLECs have jointly submitted 7 change requests to BellSouth in an attempt
2 to “jump start” the discussions on this process. BellSouth has yet to respond to
3 these proposals.

4 **Q. MUST CHANGES BE MADE TO BELL SOUTH’S METRICS TO TAKE**
5 **ACCOUNT OF ITS NEW BATCH PROCESS?**

6 A. Yes. Once the new process is developed and approved, metrics will need to be
7 created to measure its effectiveness.

8

9 **PriceWaterhouseCoopers Attestation**

10 **Q. MR. MCELROY DESCRIBES AN ATTESTATION BY**
11 **PRICEWATERHOUSECOOPERS (“PwC”) FOR BELL SOUTH. DO YOU**
12 **HAVE ANY INITIAL CONCERNS ABOUT HOW THE TEST WAS**
13 **DONE?**

14 A. Yes. The test was performed without participation by CLECs or a public service
15 commission, which casts doubt on its objectivity, completeness and conclusions.
16 Because BellSouth has provided only limited information about the test, it is
17 impossible at this juncture for CLECs to evaluate fully the test methodology or
18 results.

19 **Q. PLEASE COMMENT ON THE SCOPE OF THE ATTESTATION.**

20 A. Only the lift and lay process was tested. Although PwC states that it issued orders
21 and reviewed the ordering process, there appears to be no data provided with
22 respect to the ordering process. Aspects of UNE-L migration such as LNP,
23 directory listings, trouble handling and 911 were not tested.

1 **Q. PLEASE COMMENT ON PWC’S METHODOLOGY.**

2 A. Without a test plan, it is difficult to know what PwC did or how it was done.
3 Based on what is provided in Mr. McElroy’s testimony, it appears that the test bed
4 consisted of 750 lines that BellSouth wired to its frames in three central offices.
5 These lines were translated in the BellSouth switches, but did not go to a CLEC
6 collocation cage or switch. When the “migration order” was worked, the lines
7 were re-terminated on the CLEC portion of the BellSouth main distributing
8 frames and then run back to the switches. According to BellSouth, most of the
9 orders were issued using BellSouth bulk ordering process.

10 **Q. PLEASE COMMENT ON THE EXCEPTIONS NOTED BY PWC.**

11 A. For 22 lines, no dial tone was detected prior to the cut, but the cuts were done
12 anyway. If this problem existed for a live customer, and the trouble was on the
13 loop, the customer would have continued to have problems after the cut. If
14 customer were suspended or had had dial tone removed for some reason, the
15 CLEC would not have wanted the cut to proceed.

16 For 3 lines, the was no dial tone for longer than 20-40 minutes, with no
17 explanation given. The result for a real customer would be the inability to make
18 calls during this period.

19 Two lines were cut on the wrong due date (one early and one late). In the
20 case of an early cut, the CLEC might not have completed translations, leaving the
21 customer with no dial tone. Or the CLEC might not be ready to activate the LNP
22 transaction, leaving the customer unable to receive calls. The customer would
23 call for service, the CLEC would report to it to BellSouth as a UNE-P line, and

1 BellSouth would show no record of the customer existing, which could take
2 considerable time to resolve. A similar problem could occur if the cut were late.
3 The CLEC would assume the order was rejected and would pull its translations
4 from the switch and submit a new order to BellSouth. Indeed, a late cut is
5 potentially more disruptive than an early cut.

6 One line was cut even though the telephone number was wrong. In such a
7 case the wrong customer would have been migrated. The losing CLEC would
8 receive a loss notice and stop billing the customer. The gaining CLEC would not
9 bill the new customer since no order was placed for that migration. If the
10 customer reported trouble to the losing CLEC, it would not be able to resolve it,
11 since according to BellSouth, it would no longer own the customer. If trouble
12 were reported to the new CLEC, it would turn the customer away, since the
13 customer would not be in its database. BellSouth provides no explanation of why
14 this problem happened. It simply says it was "resolved" by working with the
15 pseudo CLEC.

16 For six lines, CLEC dial tone was not tested prior to the cut. If CLEC dial
17 tone had not been present, the customer would have been migrated with no dial
18 tone.

19 For 47 (according to BellSouth) or 49 (according to PwC) lines, no
20 cutover notification was given. In a non-coordinated cut (which MCI will use for
21 residential customers), BellSouth notifies CLECs of the cut via a fax or email
22 apparently generated by the EnDI system. Testing showed that this system failed
23 on at least one day and presumably more, causing 47 (or 49) notifications to be

1 "misplaced" and not sent. CLECs would have assumed that the customer was not
2 cut over and thus would not have activated the LNP transaction. The customer
3 would have been unable to receive calls. The CLEC would not be aware of the
4 problem until the customer called to complain. The CLEC would then have to
5 work with BellSouth to figure out what the problem was, a process that would
6 take time and cause customer dissatisfaction.

7 **Q. IS THIS A SMALL NUMBER OF PROBLEMS?**

8 A. No. Out of the 724 orders observed, 81 problems were noted, or 11% of the total.
9 Just based on the limited information made available to CLECs about the test,
10 therefore, it is clear that BellSouth's batch hot cut process is flawed and that its
11 use would result in significant harm to consumers.

12 **Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?**

13 A. Yes, it does.

1 **CERTIFICATE OF SERVICE**

2
3 PERSONALLY APPEARED before me, Betty J. DeHart, who, being duly sworn,
4 deposes and says that she is not a party to these proceedings and has no interest therein;
5 that on the 12th day of March, 2004, she served by mail the Rebuttal Testimony of Sherry
6 Lichtenberg in the above entitled case upon all counsel of record by causing same to be
7 deposited in an authorized United States Mail Box; that the envelopes containing said
8 document were properly addressed, securely wrapped and sealed and bore the proper
9 postage; and that said envelopes were addressed to the persons indicated below, and via
10 electronic mail by sending copies of same via electronic mail to the email addresses
11 indicated below.
12

13
14 F. David Butler, Esquire
15 david.butler@psc.state.sc.us
16 The Public Service Commission
17 State of South Carolina
18 Post Office Drawer 11649
19 Columbia, S.C. 29211
20

21 Patrick Turner, General Counsel
22 Patrick.turner@bellsouth.com
23 BellSouth Telecommunications
24 Post Office Box 752
25 Columbia, S.C. 29202
26

27 Robert E. Tyson, Jr., Esquire
28 rtyson@sowell.com
29 Sowell, Gray, Stepp & Laffitte, LLC
30 Post Office Box 11449
31 Columbia, S.C. 29211
32

33 Elliott Elam, Acting Consumer Advocate
34 elam@dca.state.sc.us
35 South Carolina Department of Consumer Affairs
36 Post Office Box 5757
37 Columbia, S.C. 29250-5757
38

39 John J. Pringle, Jr., Esquire
40 jpringle@ellislawhorne.com
41 Ellis, Lawhorne & Sims, P.A.
42 Post Office Box 2285
43 Columbia, S.C. 29202

1 Edward H. Phillips, Esquire
2 Edward.Phillips@mail.sprint.com
3 Sprint Communications Company, LP
4 Legal Department Mailstop NCWKFR0313
5 14111 Capital Boulevard
6 Wake Forest, N.C. 27587-5900
7

8 Rowland L. Curry, Principal
9 rcurry@Austin.rr.com
10 Curry and Associates
11 1509 Mearns Meadow Boulevard
12 Austin, TX 78758
13

14 Mr. Robert Loube
15 Director, Economic Research
16 Rhoads and Sinon, LLC
17 10601 Cavalier Drive
18 Silver Spring, MD 20901
19

20 Margaret M. Fox, Esquire
21 pfox@mcnair.net
22 John M. Bowen, Jr., Esquire
23 jbowen@mcnair.net
24 McNair Law Firm, P.A.
25 Post Office Box 11390
26 Columbia, S.C. 29211
27
28
29

Betty J. DeHart

30
31 SWORN to before me this
32
33 _____ day of March, 2004.
34
35

36 _____(L.S.)
37 Notary Public for South Carolina
38 My Commission Expires: _____
39
40
41